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5 Attorneys for Plaintiff  
NORCA INDUSTRIAL, LLC

13 NORCA INDUSTRIAL, LLC, a New York ) CASE NO. C 07 3425 EDL  
Limited Liability Company, )

15 Plaintiff,

CASE NO. C 07 3425 EDL

V.

**DECLARATION OF ROBERT  
BLUMENKRANTZ IN SUPPORT  
OF PLAINTIFF'S EX PARTE  
APPLICATION FOR  
TEMPORARY RESTRAINING  
ORDER, PRELIMINARY  
INJUNCTION AND EXPEDITED  
DISCOVERY**

17 ROBERT WREN, an individual; PRIMROSE  
18 METALS, INC., a California corporation;  
19 RICHARD RAYBIN, an individual; LIFETIME  
20 CAPITAL GROUP, an unknown entity;  
21 VICTORIA PICOLOTTI, an individual;

Date: July 2, 2007  
Time: 10:00 a.m.  
Room: Clerk's Office, 16th Flr.

ROBERT BLUMENKRANTZ declares:

24       1. I am a vice president of plaintiff Norca Industrial LLC, a New York limited  
liability company (hereafter "Norca"). I have at all times worked at Norca's headquarters office,  
25 located in Great Neck, New York. The facts stated in this declaration are based upon my  
26 personal knowledge, except where stated to be on information and belief, and as to those, I  
27 believe it to be true.

2. On or about June 6, 2007, I had a telephone conversation with Steve Song, a  
 3 buying agent associated with Norca. I requested that he travel to Norca's office in New York to  
 4 meet with management. Mr. Song became upset and said that he shouldn't have to come to New  
 5 York. The next day I had a further telephone call with Mr. Song, in which he announced that he  
 was quitting as Norca's agent, effective immediately.

6. As a vice president, I am familiar with Norca's handling of Requests for Quotes  
 7 ("RFQ") received from customers and potential customers.

8. 4. On or about June 12, 2007, I spoke with the Manager - Regional Procurement for  
 9 one of Norca's long-standing customers. He advised me that he was sending me an RFQ to  
 10 quote. He also advised me that he had already been contacted by Bob Wren and was aware of the  
 11 existence of Primrose Metals. I received the RFQ that same day. It was dated June 1, 2007, and  
 12 stated that the deadline to provide a responsive quote was June 11, 2007. A true and correct copy  
 13 of the portions of the RFQ reflecting such information is attached hereto as Exhibit A.

14. 5. Based on my knowledge of Norca's past practices, and Norca's relationship and  
 15 prior dealings with this customer, this RFQ would have been sent to Bob Wren on June 1<sup>st</sup>. Mr.  
 16 Wren never disclosed to me, nor to my knowledge any other Norca official, that he had received  
 17 this RFQ.

18. 6. Upon learning of this RFQ, on June 12<sup>th</sup>, I immediately solicited a quote from our  
 19 primary manufacturer (Changwon in Korea) and on June 14<sup>th</sup>, submitted a late quote to this  
 20 customer in response to the RFQ. (Changwon has recently changed its name to "Posco  
 21 Speciality Steel Co. Ltd.") I spoke with the customer later that day, who told me that Primrose  
 22 Metals had earlier submitted a quote from the same mill in response to this RFQ. When I spoke  
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1 with this customer several days later, he told me that Primrose Metal's quote was 9% lower than  
2 Norca's. This was a substantial RFQ, in excess of \$3.0 Million.

3 I declare under penalty of perjury under the laws of the United States of America that the  
4 foregoing is true and correct.

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6 Executed on: June 28, 2007  
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Robert Blumenkrantz

*REDACTED*

**REQUEST FOR QUOTATION**

6/1/07

Attn:

Ph:

Fx:

**SUBJECT:** *REDACTED*      **Proposal No.** *REDACTED*

Request For Quotation # *REDACTED* for SS Tube

Gentlemen:

Please provide a quotation for the subject commodities to meet the requirements described in this Request for Quotation [RFQ] **no later than Jun11, 2007 or sooner** (i.e. the bid due date). By the close of business on the bid due date supply your complete quotation must be received at our offices. If you choose not to provide a quotation, please return this RFQ package accompanied by a brief explanation of your reasons for declining to quote.

*REDACTED*

**EXHIBIT A**